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October 11, 2024

MEMO ENDORSED

Hon. Katherine Polk Failla
U.S. District Court for the Southern District of New York
Thurgood Marshall United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Richard v. Combs, et al.*, Case No. 1:24-cv-6848 (KPF)
Adjournment of November 7, 2024 Conference

Dear Judge Failla:

We represent defendant UMG Recordings, Inc. (“UMGR”) incorrectly sued in the above-captioned matter as “Universal Music Group NV” and “Interscope Geffen A&M Records.” We write on behalf of all of the defendants who have appeared in this case to date to respectfully request that the Court adjourn the conference currently scheduled for November 7, 2024. We have conferred with Plaintiff’s counsel who takes no position on this request.

We make this request for several reasons. First, there are currently several defendants who have not yet appeared in this action, and may not do so on or before November 7. Second, with respect to those defendants who have appeared, this Court has already extended answer deadlines for multiple defendants beyond the November 7 conference date. Finally, we anticipate that, in lieu of answering, multiple defendants will file pre-motion letters regarding forthcoming motions to dismiss the Complaint and that consistent with Your Honor’s individual rules, Plaintiff will then have an opportunity to file responsive letters.

As such, we respectfully request that the Court either adjourn the November 7 conference *sine die* pending the Court’s receipt and review of forth coming pre-motion letters and responses to the same, or in the alternative, reschedule the conference for a date convenient to the Court after November 21, 2024 – i.e., the latest deadline currently set for any defendant who has appeared to answer or otherwise respond to the Complaint. So doing might also permit the Court to consider setting global deadlines for briefing by the parties on multiple forthcoming motions.

There has been no other request for adjournment of this conference. As noted above, this request is made on behalf of all defendants who have appeared in this action to date, and Plaintiff has taken no position on this request.

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We appreciate Your Honor's consideration of this request.

Sincerely,



Edward B. Diskant

cc: All counsel of record via ECF

Application GRANTED. In anticipation of a number of pre-motion letters, and in light of the fact that some Defendants have yet to appear, the initial pretrial conference currently scheduled for November 7, 2024, is hereby ADJOURNED to **January 9, 2025, at 4:00 p.m.**

The Clerk of Court is directed to terminate the pending motion at docket entry 65.

Dated: October 11, 2024
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE